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District of Nevada  
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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DONNA L. GRAY

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:17-cv-02307-JAD-NJK

**JOINT STIPULATION AND ~~(PROPOSED)~~**  
**ORDER FOR EXTENSION OF TIME TO**  
**RESPOND TO PLAINTIFF'S MOTION FOR**  
**REVERSAL OR REMAND**

**(SECOND REQUEST)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be extended from March 26, 2018 to **April 26, 2018**. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel has four pending Ninth Circuit matters, which require multiple levels of review. In addition, Counsel has over 75+ pending social security cases, which require two or more dispositive motions a week until late May. Counsel also has four pending civil rights matters which require imminent attention and investigation. Counsel also became behind on her heavy caseload due to medical issues. Due to current workload demands and unanticipated leave,

1 Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's  
2 Motion for Summary Judgment. Counsel apologizes for the belated request, but did not anticipate  
3 seeking additional time due to her ongoing medical issues and unanticipated leave. Defendant makes  
4 this request in good faith with no intention to unduly delay the proceedings. The parties further  
5 stipulate that the Court's Scheduling Order shall be modified accordingly.  
6

7 Respectfully submitted,

8 Dated: March 26, 2018

/s/ \*Cyrus Safa  
(\*as authorized by email on March 26, 2018)  
CYRUS SAFA  
Attorney for Plaintiff

11  
12 Dated: March 26, 2018

DAYLE ELIESON  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

15  
16 By /s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

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18  
19 **ORDER**

20 APPROVED AND SO ORDERED:

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22  
23 DATED: March 27, 2018

  
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HON. NANCY J. KOPPE  
UNITED STATES MAGISTRATE JUDGE